

EXHIBIT 1

Kathleen A. Carrozza

From: Timothy M. Kolman, Esq.
Sent: Thursday, May 12, 2022 11:57 AM
To: Michael Ryan
Cc: Mitch Berger; Kolman Law Client Care
Subject: RE: Van Rooyen v Stern

Importance: High

I am required to file my position with the Court today regarding the TRO. The discussions that our clients are having amongst themselves is not leading to a resolution of this civil matter. It is repetitively the same, other than the adding various dollar amounts she wants to be paid for money our client does not owe. Multiple times our clients reach the same agreement that she will remove all posts and he will dismiss his Federal case against her. This is the exact agreement her previous counsel stated in an email of April 28, 2022 that he stated she approved.

Our client has agreed to those terms and will follow through with that agreement which is the release of the Civil Federal Complaint for the removal of all defamatory and derogatory posts on any and all social media. A drafted settlement agreement was prepared with her terms. We are willing to revise or possibly remove the disclaimer we were seeking she put on her page.

The bottom line is that our client will not pay her any money. He did not steal any money from her or owe her any money. This is her assumption and accusation. He is getting extremely frustrated with her repeated representation of removal of posts for dismissal of federal case and then does not agree to her own representation.

Here is verbatim, a text from your client to ours regarding settlement of this matter he received on May 4, 2022 at 09:17:

“Look, I’ve had a change of heart. If you don’t have the \$10,000.00 now, I am going to just take a leap of faith that you will pay me back at some point when you can. If you can provide me with proof of fully dismissing the case and the lawsuit within the next hour, I will remove the posts. I think we’re doing the right thing by putting everything to rest. Although this isn’t easy for me, I believe it is what’s best. A peaceful resolution. & we can both move on with our lives and focus on the future.”

If your client wants monetary relief, she can continue that process with the criminal matter that she states she has in California. The current criminal extortion investigation in the Commonwealth can be handled through its investigation. The monetary relief has been all over the place and requested in “CASH” that your client demands. Various numbers she requested, to include 0.00 in between these figures of 50,000, 47,000, 30,000, then 40,000, then installments, to a leap of faith for 10,000.

Due to the request by Chief Judge Sanchez on the movement of the TRO that needs to be filed today, if she does not wish to resolve this through Federal Complaint Dismissal and all defamatory and derogatory postings regarding our client removed for all social media with no monetary payments, our client is ready to just move forward and stop the delays and will instruct the court accordingly at close of business today.

Be advised, we do not intend to communicate further with this issue, having made our clients position clear. If this matter is not resolved by 5 pm today, the federal court will be instructed to advance on the issues contained in the TRO.

Thanks

Tim